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IR 87-32  
IR 87-24  
Ref. #10CFR2.201

February 24, 1988

William G. Counsil  
Executive Vice President

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
RESPONSE TO NRC INSPECTION REPORT NOS. 50-445/87-32  
AND 50-446/87-24

Gentlemen:

TU Electric has reviewed your letter dated January 25, 1988, concerning the inspection conducted by Mr. C. J. Hale and NRC consultants during the period December 2, 1987 through January 5, 1988. This inspection covered activities authorized by NRC Construction Permits CPPR-126 and CPPR-127 for CPSES Units 1 and 2. Attached to your letter was a Notice of Violation and a Notice of Deviation.

We hereby respond to the Notice of Violation and Notice of Deviation in the attachment to this letter.

Very truly yours,

A handwritten signature in cursive script that reads 'W. G. Counsil'.

W. G. Counsil

RDD/clk

Attachment

c-Mr. R. D. Martin, Region IV  
Resident Inspectors, CPSES (3)

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PDR ADOCK 05000445  
G PDR

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NOTICE OF VIOLATION  
(445/8732-V-01; 446/8724-V-01)

Criterion V of Appendix B to 10 CFR Part 50, as implemented by Section 5.0, Revision 3, dated July 31, 1984, of the TU Electric Quality Assurance Plan (QAP), requires that activities affecting quality shall be prescribed by and accomplished in accordance with documented instructions, procedures, or drawings of a type appropriate to the circumstances.

TU Electric Procedure NEO 3.06, "Reporting and Control of Deficiencies," requires that the disposition of each identified deficiency include the determination of the cause or causes of the deficiency and the action necessary to prevent recurrence.

Contrary to the above, the disposition of four deficiency reports reviewed during this inspection (C87-949, C87-2761, C87-3235, and C87-3787) had not established the cause or causes of the deficiencies and therefore the stated action to prevent recurrence was indeterminate (445/8732-V-01; 446/8724-V-01).

RESPONSE TO NOTICE OF VIOLATION  
(445/8732-V-01; 446/8724-V-01)

TU Electric accepts the alleged violation and the requested information follows:

1. Reason for Violation

The four deficiency reports (DRs) identified in the Notice of Violation were reviewed and the results of this review are as follows:

DR C87-949 was issued when an attribute on an Inspection Report (IR) was changed from "N/A" to "Sat" by a QC Inspector other than the original inspector. The change was signed and dated at the time it was made. The inspector who made the change was qualified to perform the type of inspection described on the IR; however, he did not provide justification for not having the change made by the original inspector as required by NQA 3.09-001. The individual has stated that he is aware of the requirements of NQA 3.09-001, and that the requirement was simply overlooked in this instance.

DR C87-2761 was issued due to identification of a change to an IR by an unknown person. The inspector of record has included an inappropriate reference in the remarks section of the IR, and an unidentified individual had added the phrase "No Ref. Use!" The inspector of record was reminded of the need to include the phrase on future IRs. A survey of similar IRs was performed to determine the extent of unauthorized IR entries which demonstrated that the incidence of occurrence was low.

DR C87-3235 was issued due to the inclusion of a marked up copy of an NCR page in a work package. This marked up page included reference to a cable which was not referenced in the original NCR. The DR indicates that the copy was inadvertently included in the work package. A review of other work packages required to contain copies of the same NCR was performed by

Paper Flow Group (PFG) personnel which indicated that the condition was isolated to the work package identified in the DR.

DR C87-3787 was issued when an inspector was requested to correct an earlier omission of the words "No Ref. Used" on an IR. The inspector made the appropriate corrections however did not include his signature and the date as required by procedure. In discussion with the inspector, he stated that he was familiar with the requirement; however, he had forgotten to include his signature and the date.

In each of the four cases described, a documentation error was made on an inspection report or in a work package which was identified by TU Electric and resulted in issuance of a Deficiency Report to describe the corrective actions taken. The cause described on each DR indicated that an error was made and/or an action occurred inadvertently.

The cause of this violation was inadequate direction to personnel regarding the degree of specificity required in documenting the cause or causes of the deficiencies.

2. Corrective Steps Taken and Results Achieved

The four DRs identified in the Notice of Violation have been reviewed to assure that the preventive actions are appropriate for the identified deficiency. In each case it was determined that the cause was addressed sufficiently to assure appropriate corrective measures were taken, and the actions taken are adequate to prevent recurrence based on the extent and nature of the deficiencies.

3. Corrective Steps Which Will be Taken to Avoid Further Violations

As described in the NRC Inspection Report, the concern regarding unauthorized entries on documents was evaluated in an attachment to DR C87-2761. As described in the evaluation results, the incidence of occurrence was very small, and does not represent a condition requiring further corrective measures. The documents which were identified did not represent a safety concern or affect hardware. It was determined that the DRs identified the appropriate preventive action, and no additional specific actions were needed.

The QC Services Supervisor has issued a memorandum to his organization informing them of the nature of this violation. This group is responsible for providing QA concurrence with construction related DR dispositions. In this capacity, the group reviews the statement of cause and preventive actions included on the DR based upon the deficiency description and investigations when appropriate.

4. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

NOTICE OF DEVIATION  
(445/8732-D-02)

Section 5.i.2, of Comanche Peak Review Team (CPRT) Procedure CPP-27, Revision 2, required that CPRT QA/QC engineers review design specifications and/or design drawings and develop a checklist of attributes that require reinspection and/or verification by documentation review. Those attributes not included on the checklist were to be identified and the justification for their exclusion documented on a memorandum.

Memorandum QA/QC-RT-6683 stated that supplemental Verification Package I-M-VII.a.9-050-01 was issued to inspect the pressure boundary materials and welds of the chiller unit, CP1-CHCICE-05.

Contrary to the above, supplemental Verification Package I-M-VII.a.9-050-01 did not identify for inspection eight groove welds specified by vendor Drawings 376-09354, 376-09355, 376-09356, and 376-09357; all at Revision D. The verification package also failed to identify a fillet weld required by vendor Drawing 376-09087, Revision D, sheet 5. These welds were required to have been included in the above supplemental verification package, but they were not and no memo justifying their exclusion was prepared (445/8732-D-02).

RESPONSE TO NOTICE OF DEVIATION  
(445/8732-D-02)

TU Electric accepts the alleged deviation and the requested information follows:

1. Reason for Deviation

The ISAP QA/QC Engineer incorrectly determined that the identified welds were inaccessible. This is evident in memorandum QA/QC-RT-6683, dated 4/10/87, which states: "The welds not identified for inspection on the drawings are either inaccessible or are covered by insulation."

2. Corrective Steps Taken and Results Achieved

Supplemental Verification Package I-M-VII.a.9-050-07 was issued on 12/09/87 for reinspection of the nine excluded welds. The inspection of these welds was completed on 12/17/87 and all nine welds were determined to be acceptable.

3. Corrective Steps Which Will be Taken to Avoid Further Deviations

Supplemental Verification Package I-M-VII.a.9-051-01 contained the same error on an identical chiller unit, CP2-CHCICE-05. This error was corrected in conjunction with the discrepancy identified in this Notice of Deviation. Furthermore, all other verification packages that had been prepared by the responsible ISAP QA/QC Engineer have been reviewed and no other discrepancies were identified. This review was completed by 1/19/88.

4. Date When Full Compliance Will be Achieved

Full compliance was achieved on January 19, 1988, with the completion of the review identified in item 3 above.